

C O N O V E R

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VIA ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
500 Pearl Street, Room 620
New York, NY 10007

Re: *Ludizaca et al v. GFB Restaurant Corp. et al.*
Case No. 13-cv-9180(RA)(MHD)

Dear Judge Abrams:

The parties participated in a settlement conference before Judge Dolinger on March 31, 2015. At the conference, the parties were not able to reach agreement on settlement, however defendants agreed to produce financial disclosure in furtherance of ongoing settlement negotiations. Defendants provided several documents on April 8, one additional document today, and have indicated they may provide several additional documents shortly.

In light of the continued settlement negotiations concerning the named and opt-in plaintiffs, the parties respectfully request a two-week extension of the deadline for the plaintiffs to file their motion for certification of a Rule 23 class from April 24, 2015 to May 8, 2015. Defendants consent to this request. The additional time will enable the parties to engage in substantive negotiations. We hope to reach a mutually acceptable settlement agreement in the near term.

Thank you for your consideration.

Respectfully submitted,
/s
Molly Smithsimon
Counsel for Plaintiffs